

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

A164050219

FACILITY: Loc Performance Products		SRN / ID: A1640
LOCATION: 1600 N LARCH ST, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Jessica Johnson , Corporate Quality		ACTIVITY DATE: 08/21/2019
STAFF: Samantha Braman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection for compliance with PTI Nos. 157-18, 123-18, and 309-07,		
RESOLVED COMPLAINTS:		

Inspection Report

A1640 – Loc Performance Products (formerly Demmer)
1600 Larch Street & 736 McKinley Street, Lansing, MI

Facility Contacts:

Jessica Johnson, Corporate Quality and Management Systems, 734-927-3858, jjohnson@locper.com

Facility Description:

Loc Performance Products is located at the old Motor Wheel site on the north side of Lansing. The areas north and east of the plant are mostly residential with industrial and commercial areas to the south and west.

Plant operates 5 days a week with occasional Saturdays and has two shifts, 6am-4:30pm and 4:30pm-3am.

Loc operates metal cutting, bending, welding, and painting processes for fabricating large thick metal components which are primarily used in military vehicles or construction equipment. The metals are primarily steel and aluminum.

Three Permits have been issued to Loc for painting operations. PTI 123-18 is a General PTI for coating at the 1600 Larch location, PTI No. 309-07 is for coating at the McKinley Street location, and PTI No. 157-18 limits VOC and Hazardous Air Pollutants (HAP) to levels below Title V Major Source threshold; opting Loc out of the ROP program. Loc submits emissions reports to MAERs annually because they are a synthetic minor opt-out source. They do not presently pay fees.

Inspection Notes:

1. Personnel change within the environmental department. Old contact, Pedro Chavez is no longer at the site. The new contact is Jessica Johnson, Corporate Quality and Management Systems.

No.	Emission Unit or Flexible Group	Description	Permit Number or Exemption
1	FG-COATING	Large paint line & small paint line both equipped with natural gas ovens.	PTI 123-18 (General)
2	FG-SOURCE	All coating lines and associated purge and clean-up.	PTI 123-18 (General)
3	EU-MetalParts	Miscellaneous metal parts paint spray booth and natural gas oven.	PTI 309-07
4	FGFacility	All processes located at the source.	PTI 157-18 (Opt-out)
5	Shot Blast	Three sandblast cabinets and one big sandblast booth.	Rule 285(I)(v)(i)(C)
6	Metal Cutting	Water Jet and various other small types	Rule 285(I)(vi)

Inspecti**Summary**

I arrived onsite at 1:58pm for a scheduled and unannounced inspection. This was also an initial contact as the facilities new Air Inspector. There were no odors or visible emissions during my visit. Once in the lobby, I was told that Pedro Chavez was no longer with the company and that his replacement is Jessica Johnson.

Jessica gave me a tour around the facility and following the tour we returned to her cubicle to go over specific permit requirements, as no conference rooms were available for the afternoon. During my inspection, I primarily focused on the permitted units.

Records I received are from 2018.

PTI 123-18:

This permit covers the coating operations. Specifically, it covers FG-COATING and FG-SOURCE. The emission limits for VOC are 2000 lb/month and 10 tpy. Loc is reporting a high of 433 lbs/month VOC emitted and a year to date of 0.7247 tpy VOC emitted. This is far below the permit limit.

I also received copies of the paint usage records of each product used and how many gallons used/wasted. Records from 12/19/18 to 8/15/19.

The small parts line and the large parts line were both not operating during my inspection. The lines are equip with a down draft filter system. The lines utilize HVLP spray applicators. The stacks from this 1600 Larch facility are given a weekly visual inspection of the stacks.

PTI 309-07:

This permit covers Emission Unit EU-MetalParts.

The paint booth and associated oven are located in a separate building located to the north of the main plant. The building is sometimes referred to as the McKinley Street plant. The building is primarily used as a warehouse. Because the building is contiguous to the Larch Street plant and is also operated by Loc, it is considered as part of the Larch Street stationery source and shares the same SRN: A1640.

The miscellaneous metal parts coating process at McKinley is a single large paint booth. Both prime and topcoats are applied in the booth. An oven of similar size is adjacent to the booth to the south. The paint process has seen intermittent use over the last several years. Last use was July of 2019. It was not operating during the inspection.

PTI 157-18:

This permit is an opt out permit for the facility. It covers all process equipment, grandfathered, and exempt equipment. The aggregate HAP emission limit is 22.5 tpy, Loc is reporting 0.0918 tons. This is well below the allotted amount.

Sand Blast

The blast unit is Rule 285(l)(v)(i)(C) exempt, however; the area around the sandblasting cabinets could use some housekeeping to make sure the used material is contained.

The outdoor sandblast booth has undergone some major improvements and appears to be in compliance.

Metal Cutting

It is my understanding that they are multiple large table type cutters at this source. The one I inspected appeared be a water jet. Under table draft collection is used for initial particulate control. Metal cutting is Rule 285(l)(v)(i)(B) exempt.

Other

Welding of metal is exempt by Rule 285(i). Bending of metal is exempt by Rule 285(l)(i).

I left the site around 3:20pm.

Based on this information, the facility appears to be in compliance with PTI Nos. 309-07, 157-18, and 123-18.

NAME Sumithea Davis

DATE 9/26/19

SUPERVISOR B.M.

